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SUBJECT: Review and Comment on the Soil Sampling and Analysis Work Plan for the Hecla Mining Site, St. George, Utah

FROM: Randall W. Breeden, Geohydrologist
RCRA Corrective Action Program

TO: Janice Pearson, Project Engineer
RCRA Enforcement Program

Per your request I have reviewed the revised Soil Sampling and Analysis Work Plan and have the following comments. If you need clarification, please call me.

Comments:

In section 2.3, page 7, "Drilling and Sampling" the text states that "...a dry-core sampler would be the first choice in collecting samples on a continuous basis. A split spoon sampler would be the second choice for obtaining samples at discrete intervals (if the dry core sampler is not successful)". We want to make sure that continuous cores are collected no matter what method of collecting them is used. Therefore, I would change the sentence related to using the split spoon sampler to read as follows: "If the dry-core sampler is not successful, then a split spoon sampler will be used and every attempt will be made to collect continuous cores with the split spoon".

In section 2.3, page 7, "Auger hole within Pond 2". There should be a sentence added that states that "every attempt will be made to drill and collect samples as close to the liner as possible without compromising the integrity of the liner". As it now states, they may only drill within 5 feet of the bottom of the pond, which is to far above the bottom to adequately assess if free liquids are present below that depth.

In section 2.3, page 8, "Auger hole outside of Pond 2", the last sentence states that "...drilling 5 to 10 feet into the sedimentary units may be done (if possible)". Those depths are probably more than adequate, but in the event that the saturation in the bedrock extends beyond 10 feet, we should have language that allows us to continue beyond the 10 foot depth. Therefore, I suggest changing the wording of the last sentence of this paragraph to read as follows: "...drilling into the sedimentary units will continue as far as necessary to determine the vertical



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extent of saturation in the bedrock unit".

Thank you for the opportunity to provide comment on the document, I recommend approval of the work plan with the inclusion our comments. If you have any questions please don't hesitate to contact me at 312-6522.